

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

In the Matter of	)	
	)	
	)	RM No. 10800
Amendment of Part 25 of the Commission's	)	
Rules To Adopt Licensing and Service Rules	)	
for Aeronautical Mobile-Satellite Service	)	
("AMSS") Operations in the Ku-Band	)	

To: The Commission

**REPLY COMMENTS OF LORAL SPACE & COMMUNICATIONS LTD.**

Loral Space & Communications Ltd. ("Loral") files these brief reply comments in the above-captioned proceeding, which proposes licensing and service rules for Aeronautical Mobile-Satellite Service ("AMSS") operations in the Ku-band.<sup>1</sup> Loral provides Ku-band transponder capacity on the Telstar 6 satellite at 93° W.L. The Boeing Company for its authorized AMSS system -- the Connexion by Boeing<sup>SM</sup> system.

All parties that commented on the petition for rulemaking support the initiation of a rulemaking proceeding to develop licensing and service rules for operations in the Ku-band.<sup>2</sup> In addition, the Commission recently allocated the 14.0-14.5 GHz band to the Mobile-Satellite

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<sup>1</sup> See *Petition for Rulemaking*, Amendment of Parts 2 and 25 of the Commission's Rules To Allocate Spectrum in the 14-14.5 GHz Band to the Aeronautical Mobile-Satellite Service ("AMSS") and To Adopt Licensing Rules for AMSS Operations in the Ku-Band, filed by The Boeing Company (July 21, 2003); see also *Public Notice*, Consumer & Governmental Affairs Bureau, Reference Information Center, Report No. 2632 (Oct. 2, 2003).

<sup>2</sup> See Comments of Aeronautical Radio, Inc., RM-10800 (filed Nov. 3, 2003); Comments of The Boeing Company, RM-10800 (filed Nov. 3, 2003); Comments of PanAmSat Corporation, RM-10800 (filed Nov. 3, 2003); Comments of Rockwell Collins, Inc., RM-10800 (filed Nov. 14, 2003).

Service (“MSS”), including AMSS, on a secondary basis,<sup>3</sup> a decision which implements domestically the international AMSS allocation adopted at WRC-03. The recent application of Aeronautical Radio, Inc. (“ARINC”) to implement the SKYLink AMSS system also underscores the substantial interest in broadband AMSS services.<sup>4</sup> These developments confirm the need to develop AMSS licensing and service rules to ensure that these innovative new services can be provided to U.S. consumers in a manner that fully protects the operations of other authorized users of the Ku-band.

Accordingly, in view of recent developments regarding AMSS services and unanimous support for the proposed rulemaking, Loral urges the Commission to promptly initiate a rulemaking proceeding to adopt licensing and service rules for AMSS operations in the Ku-band.

Respectfully submitted,

LORAL SPACE & COMMUNICATIONS LTD.

By: /s/ John P. Stern

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<sup>3</sup> See Amendment of Parts 2, 25, and 87 of the Commission's Rules to Implement Decisions from World Radiocommunication Conferences Concerning Frequency Bands Between 28 MHz and 36 GHz and to Otherwise Update the Rules in this Frequency Range, ET Docket No. 02-305, FCC 03-269 (rel. Nov. 4, 2003) at ¶¶ 72-78 and App. B.

<sup>4</sup> See Aeronautical Radio Inc., Application for Blanket Authority to Operate Aboard Aircraft Up To 1000 Technically-Identical Transmit and Receive Mobile Earth Stations in the 11.7-12.2 and 14.0-14.5 GHz Frequency Bands, File No. SES-LIC-20030910-01261, Call Sign E030205 (Sept. 2, 2003).